

**J'UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**J'ON ALEXANDER and JUAN  
IZQUIERDO, on behalf of themselves and  
others similarly situated,**

**Plaintiffs,**

**Case No. 23 CV 11101 (ER)**

**v.**

**DRG HOSPITALITY GROUP, INC. d/b/a  
DELMONICO'S,**

**Defendant.**

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**[proposed] DEFAULT JUDGMENT**

It is hereby **ORDERED, ADJUDGED, AND DECREED**, default judgment is entered against Defendant DRG Hospitality Group, Inc. and in favor of Plaintiffs J'on Alexander and Juan Izquierdo in the total amount of \$\_\_\_\_\_ as follows. Plaintiff Alexander is awarded \$3,493.19 in back wages/tips under the New York Labor Law ("NYLL"), plus 9% prejudgment interest accruing from September 24, 2023 and totaling \$\_\_\_\_\_; \$5,516.23 in liquidated damages; \$2,700 in wage notice statutory damages; and \$5,000 in wage statement statutory damages. Plaintiff Izquierdo is awarded \$1,167.86 in back wages under the NYLL, with 9% prejudgment interest accruing from September 24, 2023 and totaling \$\_\_\_\_\_; \$2,580.93 in liquidated damages; \$1,650 in wage notice statutory damages; and \$5,000 in wage statement statutory damages. Plaintiffs Alexander and Izquierdo are awarded \$11,604 in attorneys' fees and costs. If the judgment is not entirely paid within 90 days of judgment, or 90 days after the expiration of time to appeal and no appeal is then pending, whichever is later, the total amount of judgment shall automatically increase by 15 percent. The Court also awards post-judgment interest pursuant to 28 U.S.C. § 1961.

Dated: New York, New York  
\_\_\_\_\_, 202\_

DANIEL ORTIZ  
Acting Clerk of Court

By: \_\_\_\_\_  
Deputy Clerk